#### **ILLINOIS COMMERCE COMMISSION**

**DOCKET Nos. 13-0501/13-0517 (cons.)** 

# SUPPLEMENTAL REBUTTAL TESTIMONY ON BIFURCATED ISSUES

**OF** 

**ROBERT J. MILL** 

**Submitted On Behalf** 

Of

AMEREN ILLINOIS COMPANY d/b/a Ameren Illinois

### Ameren Exhibit 6.0

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9	I.	INTRODUCTION AND WITNESS QUALIFICATIONS	
10	Q.	Please state your name and business address.	
11	A.	My name is Robert J. Mill. My business address is 6 Executive Drive, Collinsville,	
12	Illinois 62234.		
13	Q.	Are you the same Robert J. Mill who sponsored direct and rebuttal testimonies in	
14	this proceeding?		
15	A.	Yes, I am.	
16	II.	PURPOSE AND SCOPE	
17	Q.	What is the purpose of your supplemental rebuttal testimony?	
18	A.	The purpose of my supplemental rebuttal testimony is to respond to three	
19	recommendations by Staff witness Ms. Theresa Ebrey regarding the definition of "formula rate		
20	structure" and "formula rate template," and what changes to the formula rate structure and		
21	protocols require Commission approval in a separate Section 9-201 proceeding. These		
22	recommendations were made by Ms. Ebrey for the first time in her direct testimony in this		

23 proceeding. Given the expedited schedule established for the "current proposals" (those raised in 24 Docket No. 13-0301, the subject of Docket No. 13-0517, or raised in the AG's complaint in 25 Docket No. 13-0501) in this case, and the desire of the Company and Staff to create a full and 26 complete record on the issues, these three recommendations were bifurcated from other issues 27 addressed by the direct testimony of parties. III. RESPONSE TO MS. EBREY 28 Please describe the recommendations made by Ms. Ebrev that you will be 29 Q. 30 addressing. 31 A. Ms. Ebrey made four recommendations in her direct testimony. Her first 32 recommendation, that the Commission approve changes proposed by AIC in its filing in Docket 33 13-0517 to Schedules FR A-1 and FR A-1 REC, was addressed in my Rebuttal Testimony, filed 34 October 7, 2013. The remaining three recommendations were bifurcated to be addressed on a 35 separate schedule. This Supplemental Rebuttal Testimony will address these remaining 36 recommendations by Ms. Ebrey: 37 1) That the Commission specifically define the term "formula rate structure" to mean the Commission approved tariff set forth in AIC's tariffs as Rate MAP-P, Tariff Sheet 38 39 Nos. 16 - 16.013; 40 2) That the Commission specifically define the term "formula rate template" to mean the formula rate schedules (other than FR A-1 and FR A-1 REC), appendices (Apps) and 41 related workpapers; and 42 43 3) That the Commission find that only changes to Schedules FR A-1 and FR A-1 REC require Commission approval in a Section 9-201 filing. 44

#### 45 Q. What is your general response to Ms. Ebrey?

A. Her recommendations are flawed and should be rejected for the following reasons. First, Ms. Ebrey defines "formula rate structure" to be the same as AIC's Rate MAP-P tariff; this new definition is far too narrow an interpretation of "formula rate structure." Second, her resulting conclusion that only changes to Schedules FR A-1 and FR A-1 REC require Commission approval in a Section 9-201 filing ignores the legal requirement that changes to the formula rate "protocols" are only permitted under a Section 9-201 filing. Third, her proposal presents a number of material, practical concerns, not least of which is that every annual formula rate update filing could become "open season" for litigating changes to the supporting schedules and appendices of the formula rate (the supporting schedules and appendices (Apps) referenced throughout my testimony are those listed on Sheet No. 16.005 of Rate MAP-P). Finally, as I will demonstrate, her new definition of "formula rate structure" contradicts previous positions taken by Staff and Commission precedent in formula rate proceedings.

Although I believe her proposals should be rejected outright, I also note that the changes she proposes could affect both AIC and ComEd. If the Commission determines that her proposals should be considered, they are more properly addressed in the rulemaking ordered by the Commission in Docket Nos. 11-0721, 12-0001, and 12-0321 for the purpose of a systematic approach governing the formula rate process.

#### Q. Do you have any recommendations in response to Ms. Ebrey?

A. Yes. My recommendation is that her proposals be rejected as indicated above. The effect of rejecting her proposals would be that the "formula rate structure and protocols" which would require a Section 9-201 filing to change would continue to include the formula rate tariff (Rate

67 MAP-P) sheets (Schedules FR A-1 and FR A-1 REC), along with the supporting schedules and 68 appendices (which together I define as the formula rate template). I recommend that the 69 Commission in its order in this case make this clear and define AIC's "formula rate template" to 70 include Schedules FR A-1 and FR A-1 REC as well as the supporting schedules and appendices, 71 and to find that the "template" so defined represents the formula rate structure that requires a 72 Section 9-201 filing to change. I further recommend the Commission also order AIC to file all of 73 its formula rate schedules and Apps as part of the Rate MAP-P tariff. This is consistent with 74 EIMA's transparent and standardized ratemaking process, and removes the uncertainty that has 75 been created by the requirement that AIC include only two summary schedules in its tariff. 76 If however the Commission determines to consider Ms. Ebrey's proposals, I recommend 77 they be addressed in the rulemaking I mentioned above. I would further recommend the 78 Commission offer the parties some structure to the rulemaking process which may include 79 required workshops and a time frame by which the final order is expected to be entered. As mentioned above this would bring all the parties together and avoid multiple proceedings where 80 81 different arguments, fact patterns, and interpretations of law could lead to contrary rulings. 82 Q. What do you understand to be the basis for Ms. Ebrey's position concerning the 83 terminology used in describing "formula rate template" and "formula rate structure"? 84 I understand her to be concerned about "confusion" between the terms "formula rate A. 85 template" and "formula rate structure" and, as a result, what changes to the formula rate tariff, 86 schedules, appendices and workpapers require Commission approval in a Section 9-201 filing. 87 By defining the term "formula rate structure" to mean the tariff sheets set forth in AIC's Rate MAP-P, Tariff Sheet Nos. 16 – 16.013 (Schedules FR A-1 and FR A-1 REC) and recommending 88

- 89 the Commission find that only changes to Schedules FR A-1 and FR A-1 REC require
- 90 Commission approval in a Section 9-201 filing, Ms. Ebrey is seeking to substantially narrow the
- 91 scope of changes that require Section 9-201 approval.
- 92 Q. Is her approach the right approach to address her concerns?
- 93 A. No. Although I am not an attorney, her approach is inconsistent with the EIMA, and will
- not alleviate the "confusion" she alleges. AIC's brief will address more fully the legal issues with
- Staff's approach, but the end result would be more confusion, and would open the door for
- changes to the formula rate schedules and appendices to be proposed and litigated, and
- potentially approved, in every update proceeding. As I discuss below and as discussed by Mr.
- 98 Stafford, the confusion that would result from Ms. Ebrey's recommendations is evident from her
- own testimony and discovery responses. She claims for example, that "only changes that impact
- the revenue requirement on Schedules FR A-1 and FR A-1 REC would require Commission
- approval" in a Section 9-201 proceeding (Ameren Exhibit 6.1, Response to AIC Staff 1.14,
- 102 1.16.). But virtually any change to the formula rate schedules and appendices the very
- schedules and appendices she would exclude from the "formula rate structure" and approval
- requirement may impact the revenue requirement on Schedules FR A-1 and FR A-1 REC.
- Thus, if changes that impact the revenue requirement on Schedules FR A-1 and FR A-1 REC
- require Section 9-201 approval, the Section 9-201 approval requirement must apply to the
- formula rate tariffs, schedules *and* appendices.

- Q. Is Ms. Ebrey's position consistent with the operation of the formula rate?
- 109 A. No. Until this new theory was raised by Ms. Ebrey, parties, Staff, utilities, ALJs and the
- 110 Commission maintained an interpretation that changes to the supporting schedules and

appendices (the formula rate template as I define it) required Commission approval outside of the annual update proceedings. If this previous interpretation is now deemed invalid, I no longer understand how the performance-based formula rate will operate in a standardized manner (Sec. 16-108.5(c)). It seems the prospect for constant changes to the formulae and data sources in the supporting schedules and appendices during future update proceedings will create new reconciliation revenue adjustments as prior rate year (reconciliation period) calculations will differ from those used in the prior year update proceeding when revenue requirements were previously established. The Commission would be forever making the proverbial "apples" to "oranges" comparison in future reconciliations, resulting in further litigation and appeals. The only sensible, legally defensible solution is to define the formula rate structure to include Schedules FR A-1 and FR A-1 REC, *plus* the supporting schedules and appendices.

#### 122 Q. Why is that a better approach?

A. It is more consistent with the EIMA and would better meet Ms. Ebrey's goal of eliminating confusion. As I discussed in my direct testimony (Ameren Ex. 1.1, pp. 8-9), both Sections 16-108.5(c) and 16-108.5(d)(3) of the EIMA provide that the Commission has no authority in an update proceeding to consider or order any changes to the structure or protocols of the performance-based formula rate. Under EIMA the limited purpose of an update proceeding is to review the cost inputs for prudence and reasonableness. In support, the Final Order in the Docket 12-0293 update confirms that "the purpose of this proceeding is to update inputs into Ameren Illinois' existing performance-based formula rate which was established in Docket No. 12-0001. The Act specifically prohibits the ICC from modifying the performance-based formula rate itself, which is intended to protect both Ameren Illinois and ratepayers."

133 These provisions and findings ensure that once the formula rate structure and protocols were 134 established, the annual filings were simply to update cost inputs. This would allow for 135 transparency and standardized operation of the formula rate from year to year. Changes to the 136 formula rate structure or protocols would *not* happen in every update proceeding, so as to avoid 137 the formula rate becoming an uncertain and ever-shifting rate. A separate proceeding to consider 138 changes to Schedules FR A-1 and FR A-1 REC, the supporting schedules and appendices means 139 that any changes to the formula rate are carefully considered separate and apart from the cost 140 inputs. Q. What is AIC's definition of the formula rate "template"?

- 142 A. Schedules FR A-1 and FR A-1 REC, the supporting schedules and the appendices 143 together constitute the formula rate template. In short, the template is the 30 pages shown in 144 Ameren Exhibits 2.4 and 2.5. I do not include the formula rate workpapers in my definition of 145 the template.
- 146 Q. Why is it appropriate to treat the formula rate workpapers differently than the 147 formula rate schedules and Apps?
- 148 A. Mr. Stafford will address the issue of workpapers in his supplemental rebuttal testimony.
- Is the "formula rate structure" different from the "formula rate template"? 149 Q.
- 150 A. No. I view the AIC definition of the formula rate template as being synonymous with 151 formula rate structure. I believe this is confirmed by the passage of SB 9 (Public Act 98-0015). 152 SB 9 passage occurred subsequent to the initial formula rate tariff proceedings and after the 153 initial update proceedings for ComEd and AIC. The General Assembly made clarifications

154 where the Commission erred in its implementation or interpretation of EIMA. The General 155 Assembly did not make any clarifying changes to define the phrase "formula rate structure". 156 Q. What is Ms. Ebrey's view? 157 A. I understand Ms. Ebrey's position to be that the Commission should define "formula rate 158 structure" to include only the two summary schedules, FR A-1 and FR A-1 REC, and define 159 "formula rate template" to include all other formula rate schedules, Apps and workpapers. Ms. 160 Ebrey believes that defining these terms in this manner would allow the Commission to approve 161 changes to the documents she categorizes as "formula rate template" in the course of annual 162 formula rate update proceedings, and would not require consideration in separate proceedings 163 pursuant to Section 9-201. 164 Do you agree? Q. 165 A. No. The definitions Ms. Ebrey proposes do not properly capture the function and intent of 166 the formula rate to "operate in a standardized manner" as required by the EIMA. 167 Q. Please continue. 168 A. I would draw an analogy between the formula rate template and the Part 285 Schedules 169 used in traditional ratemaking. Ms. Ebrey's proposal to differentiate between the formula rate 170 summary schedules and supporting schedules would be like treating the Part 285 A-Schedules, 171 which provide an overall financial summary of the rate case filing, as having a much greater 172 relevance and importance than the underlying B, C, and D schedules. However, the underlying

B, C, and D schedules are probably more critical than the A Schedules in providing the detailed

information necessary for the Commission to draw informed conclusions and make

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determinations of prudence and reasonableness. Ms. Ebrey's position is akin to saying that in every rate case, the format and requirements of the A schedules must remain the same, but the information on the B, C and D schedules can be freely altered to suit a party's purposes. Ms. Ebrey confirmed as much in discovery, stating she does not agree that the form of Part 285 schedules and workpapers remain the same from filing to filing, but rather "Part 285 does not dictate a format to present the information." (Response to AIC-Staff 1.10.) But Part 285 does dictate the format to present information – not only in Sections 285.400 and 285.410, which specify the formats for schedules and workpapers, but rules like Section 285.3005(b), which requires the C-1 schedule of the operating income statement "shall include ICC Account number, the account description, the unadjusted total company balance at present rates, the total of all adjustments, the jurisdictional balance at present rates, the requested rate increase, and the jurisdictional pro forma at proposed rates." Ms. Ebrey appears to think that, for example, a utility could simply present the information by something other than ICC account, without variance or approval. Her position on the ability to change to the formula rate template suffers from the same misconception.

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- Q. The EIMA requires that changes to the "formula rate structure *or* protocols" be approved in a Section 9-201 filing. What is Ms. Ebrey's position on the "protocols"?
- 192 A. She notes that they are the items set forth in Section 16-108.5(c)(4) and does not discuss them further.

194 Q. Does her recommendation that the Commission find that only changes to Schedules 195 FR A-1 and FR A-1 REC require Commission approval in a Section 9-201 filing account 196 for the "protocols"? 197 Although I am not an attorney, I do not believe so. I agree that the protocols are defined A. 198 in the statute. But the protocols are not set forth in the tariff (Schedules FR A-1 and FR A-1 199 REC). They are implemented and reflected in formulas in the template (as AIC defines it). Ms. 200 Ebrey agrees; she states ratemaking impact of the formula rate protocols are reflected "through 201 the inputs for the various applicable schedules, appendices and workpapers that support the 202 revenue requirements shown on Schedules FR A-1 and FR A-1 REC." (Response to AIC –Staff 203 1.24, see Ameren Exhibit 6.1.) Narrowly limiting the Section 9-201 approval requirement to 204 changes to the tariffs (Schedules FR A-1 and FR A-1 REC) suggests that changes to "protocols" 205 contained in the template could occur without Section 9-201 approval. This would appear to me 206 to be contrary to the statute. 207 Q. Has the Commission equated the formula rate tariffs and the formula rate structure 208 in the manner that Ms. Ebrey has? 209 A. Not that I am aware of. 210 Q. Ms. Ebrey says that the "practical result" of adopting her recommendation would 211 allow changes to the supporting schedules in annual update proceedings, instead of in 212 separate proceedings under Section 9-201. Do you agree? 213 A. Yes – and this is exactly the problem with her recommendations. If her 214 recommendations are adopted, any party – Staff, a utility, or interveners – could propose changes 215 to the formula rate schedules and appendices during the course of future update proceedings.

Moreover, the summary schedules are populated from the formulae, inputs and calculations 217 contained in the supporting formula rate schedules and Apps. These underlying documents are 218 critical components of the formula rate itself. Changes in the supporting documents are likely to 219 lead to changes in revenue requirement on the summary schedules. 220 Q. Is it reasonable to assume that only two summary schedules, one for the rate year 221 (FR A-1) and the other for the prior rate year (FR A-1 REC), can for practical purposes be 222 considered the entirety of the EIMA "formula rate structure"? 223 A. No. In the two summary schedules, it is apparent that the major cost components listed 224 on FR A-1 and FR A-REC lack all formulaic details of how they are derived. The major 225 expense, rate base, and capital structure cost components for the filing year and reconciliation 226 year revenue requirements are derived from cost inputs, allocators, adjustments and formulae in 227 the supporting Schedules and Apps, with only the final determined values carried forward and 228 reported on the summary schedules. It is my opinion that these two summary schedules and the 229 summary level data reported on them cannot logically qualify as being the sum and substance of 230 what the General Assembly envisioned as being the full extent of the "formula rate structure". 231 The supporting Schedules and Apps incorporate the protocols defined in EIMA, present various 232 adjustments, allocations and computations for the input data, and provide the transparency 233 necessary to permit standardized operation of the formula rate structure. Mr. Stafford provides 234 detail on how this is the case in his supplemental rebuttal. For example, he explains that Ms.

Ebrey would have the Commission define "formula rate structure" to have but a single line for

Ameren Illinois Company's \$2 Billion of DS Rate Base. It does not seem reasonable that DS

Rate Base is represented by a single line item in the proposed definition of "formula rate

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238 structure". Rather, the supporting Schedule FR B-1 that derives the individual rate base 239 components that begin with FERC Form 1 inputs, adjusted by data from Sch FR A-2 and 240 supporting Apps 1 through 6, all must be included in the definition of "formula rate structure". 241 Q. If the definition of "formula rate structure" is limited to the two summary schedules 242 as Staff recommends, would the Company, parties and Staff be free to propose 243 modifications to any of the allocators (on Sch FR A-2) or to Schedules FR C-1, C-2 or to 244 App 7 in future update proceedings? 245 A. Yes. Opening up any of the Schedules and Appendices to changes within the context of 246 future update proceedings would create further complications and uncertainty. 247 Q. What are some examples of the type of information included on the schedules for 248 which Ms. Ebrey does not believe Commission approval of changes under Sec. 9-201 is 249 necessary? 250 A. Schedule FR D-1 presents the computation of the Company's actual year-end capital 251 structure. In response to a data request (Response to AIC-Staff 1.19), Ms. Ebrey stated that 252 Schedule FR D-1, including the capital structure computation, "would not be considered part of 253 the formula rate structure and protocols." Thus, Ms. Ebrey's proposal would allow the Company 254 or others to alter the method by which it calculates its year-end capital structure in any update 255 proceeding without separate Commission approval of the changed method.

Q. So Ms. Ebrey's position is that AIC could alter Schedule D-1 without Commission approval in a Sec. 9-201 proceeding?

A. Yes, it appears to be. In response to a data request AIC-Staff 1.22, Ms. Ebrey indicated that the Company "could alter Schedule D-1 without Commission approval." She goes on to state that "the utility must compute the cost of equity as required by Section 16-108.5 of the Act" and "such changes are not afforded de facto approval since the changes are still subject to a review of prudence, justness and reasonableness by the Commission." But that suggests the absurd outcome where AIC could propose in an update proceeding to add a risk adjustment of 50 basis points to its statutory formula return on equity simply by deciding to add a line with a description "plus risk adjustment" after line 16 of Schedule FR D-1, and arguing that such result was just and reasonable. I don't believe that this is consistent with the requirement that EIMA operate in a standardized manner. Likewise, parties or Staff could do the same by adding a new line to Schedule FR D-1 to reduce the cost of common equity by a 50 basis point adjustment. Of course, the parties, Staff and Company would litigate such proposals and the Commission would then have to rule on such changes as part of the final order in the update proceeding. These sorts of adjustments to Schedule FR D-1 are not possible in an update proceeding under the Commission's current interpretation of EIMA.

### 273 Q. Are there other examples of changes to the formula template that AIC could

### 274 propose without Section 9-201 approval?

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A. Yes. AIC could file an update case where it modifies the allocators on Schedule FR A-2 that it contends adds more precision to determining revenue requirements than what previously had been approved by the Commission. Of course, the Company in this example would include

extensive supporting evidence in its filing and parties and Staff could respond. It is exactly this kind of tinkering with the formula rate that Section 9-201 approval requirement is intended to avoid.

# Q. Ms. Ebrey implies that adoption of her definitions would simplify the formula ratemaking process. Do you agree?

A. No. Her proposals are not consistent with EIMA, so whether they simplify the formula ratemaking process is moot. Having said that, as discussed above, changes to the supporting schedules are likely to result in changes to the revenue requirement on the summary schedules. If Ms. Ebrey's definitions were adopted by the Commission, and a change to the supporting schedules or Apps was proposed in an annual update proceeding, but had an impact on the summary schedules, it is not clear to me whether that proposal should be considered in an annual formula rate update proceeding or a Section 9-201 proceeding. In this way, Ms. Ebrey's proposal confuses the issue more than necessary. If, instead, the Commission determined that modifications to formula rate schedules and Apps were permissible only in the context of a Section 9-201 proceeding, parties would have clear, workable guidance.

# Q. Are there other benefits of considering the supporting formula rate schedules and Apps as part of the formula rate structure?

A. Yes. Section 16-108(c) of the Act requires the formula tariff to "specify the cost components that form the basis of the rate charged to customers with sufficient specificity to operate in a standardized manner and be updated annually with *transparent information*." In an era where transparency is a goal in ratemaking and in other regulatory activities, considering the schedules and Apps as part of the formula rate structure would meet that goal. In addition,

formula rates were intended to operate in a standardized fashion, so that after the initial, or subsequent approval of the formula rate template, only the inputs to the formulas would be updated each year. However, Ms. Ebrey's recommendation would turn the standardized process on its head, by allowing a wide variety of changes to the *types* of inputs into the formula rate, rather than simple changes to the *value* of inputs into the formula rate which is the purpose of the update proceedings. There is no doubt that if Ms. Ebrey's recommendations are approved, future update proceedings will be burdened by countless additional issues as parties, Staff and Company would no longer be constrained by the discipline imposed by the Commission's previous interpretation prohibiting changes to the formula rate, including supporting schedules and Apps, within an update proceeding. In addition it would add to the cost of conducting such proceedings.

# 311 Q. Is Ms. Ebrey's position consistent with Staff's position in previous Commission proceedings?

A. No. In Docket 12-0001, the Final Order summarized Staff's position as follows: "Staff recommends that the Commission should be clear in its Order that it is adopting as the formula *all the schedules that comprise the template* pursuant to Section 16-108.5(d)(3) of the Act. ... Staff also recommended that the Commission order AIC to file on e-Docket . . . the final template approved by the Commission that consists of all schedules comprising the formula."

(Docket 12-0001, Final Order, p. 150 (Sept. 19, 2012) (emphasis added).) Ms. Ebrey did not participate in Docket 12-0001, so it is not clear to me whether her proposal constitutes a change of Staff's position on this issue since Docket 12-0001. Nevertheless, Ms. Ebrey does not explain why Staff's position in this case is different than it was in Docket 12-0001.

322 Q. Does Ms. Ebrey agree that Schedules FR A-2 through FR D-2 were intended to remain unchanged except as ordered in a proceeding under Section 9-201? 323 324 A. I do not know. Ms. Ebrey acknowledges that the Commission approved the Rate MAP-P 325 tariff as Tariff Sheet Nos. 16 – 16.013 in Docket Nos. 12-0001 and 13-0385. She notes that only 326 Schedules FR A-1 and FR A-1 REC are included in those tariff sheets, but also notes that 327 additional schedules and workpapers are listed on Sheet Nos. 16.005 and 16.006. When asked in 328 discovery whether she understood that Tariff Sheet 16.005 listed Schedules FR A-2 through FR 329 D-2 as supporting schedules, and whether she agreed that these supporting schedules were 330 intended to remain unchanged except in the context of a Section 9-201 proceeding, Ms. Ebrey 331 responded that she "does not attribute human emotions or conduct to inanimate objects. She 332 does recognize others may do so (anthropomorphic fallacy), but believes the Commission should 333 ignore any attempts to do so." (Response to AIC-Staff 1.01.) This response does not assist me 334 in understanding her position on the issues in this case. 335 Q. Would the recommendations Ms. Ebrev proposes affect only AIC? 336 A. No. The changes she proposes could affect both AIC and ComEd. Ms. Ebrey 337 acknowledges this when she states on page 7 of her testimony: "Since the formula rates for 338 Ameren and ComEd are both pursuant to the same Section 16-108.5 of the Act, the same 339 Commission conclusions should apply to both utilities consistently." Although I am not an

attorney, I understand that the establishment of policies, practices, rules or programs applicable

to more than one utility can properly be addressed in a rulemaking, not an individual case. Or at

the very least other affected utilities must be given notice and an opportunity to be heard.

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- 343 Q. Has a rulemaking been ordered?
- 344 A. Yes, the Commission has ordered just such a rulemaking to address a systematic approach
- 345 governing the formula rate process, in its orders in Docket Nos. 11-0721, 12-0001, and 13-0321.
- 346 Q. What do you propose?
- 347 A. I propose that the Commission reject her proposals outright. As part of the
- 348 Commission's order in this proceeding, I recommend the Commission define AIC's "formula
- rate template" to include Schedules FR A-1 and FR A-1 REC as well as the supporting schedules
- and appendices, and to find that the "template" so defined is the formula rate structure that
- requires a Section 9-201 filing to change. I also recommend the Commission order AIC to file all
- of its supporting formula rate schedules and Apps as part of the Rider MAP-P tariff. This would
- solidify EIMA's transparent and standardized ratemaking process, and remove the uncertainty
- that has been created by the requirement that AIC include only two summary schedules in its
- 355 tariff. Staff's proposals in this proceeding demonstrates that the previous approach of only
- including the two summary schedules within the tariff has created ambiguities for Staff that
- would be best remedied by a Commission conclusion that all schedules and Apps together
- constitute a single formula rate structure, and as such, should be included within the Company's
- Rate MAP-P tariff. Should the Commission determine Ms. Ebrey's proposals should be
- 360 considered, however, they are more properly addressed in the rulemaking ordered by the
- 361 Commission in Docket Nos. 11-0721, 12-0001, and 13-0321.
- 362 IV. CONCLUSION
- 363 Q. Does this conclude your supplemental rebuttal testimony?
- 364 A. Yes, it does.